Ashford Business Services Ltd

Document Retention Policy

How long records are kept, who is responsible for them, how legal holds work, and how records are disposed of. General wording only, not legal advice. Check it fits your situation and seek professional advice before relying on it; adapt every bracketed item to your organisation. Organisation: James Patel | Policy owner: Sarah Mitchell, Office Manager | Effective: 9 November 2026 | Review: 9 November 2027 | Version: Version number

1. Purpose, scope and roles

This policy sets out how James Patel keeps, protects, and disposes of its records, so it can find what it needs, keep only what it needs, and dispose of records in a controlled way when they are no longer needed. It works with the Document Retention Schedule: this policy sets the rules, and the schedule sets each retention period. It applies to all records created or received by James Patel in the course of its work, in any format, including paper, electronic files, emails, messages and photographs, and records in systems provided by James Patel, and to all staff, including employees, temporary staff, contractors and volunteers, and anyone else who creates, handles or stores records for James Patel. **Office Manager:** owns this policy, keeps it up to date, and answers questions about it. **Office Manager:** makes sure this policy is followed and approves legal holds and disposal of records. **Office Manager:** keeps the schedule and disposal log up to date and trains staff on this policy. **Managers:** make sure their team follows this policy and the schedule, and report any problem to Office Manager. **All staff:** follow this policy, file records in the agreed place, and destroy no records outside the process set out here.

2. Retention principles and schedule

1. Keep a record only as long as the work of the organisation needs it, or as long as applicable law, regulation, contract, or funder requirement requires. **2.** File each record in the agreed location as soon as practicable, so it can be found by the people who need it and by no one else. **3.** Do not keep duplicate copies longer than the original, unless the duplicate is needed for a reason recorded in the schedule. **4.** Destroy no record before the end of its retention period, except under a legal hold release or an approved disposal under section 4. **5.** Where a retention period is set by applicable law, regulation, contract, or funder requirement, that requirement prevails, and the schedule row should name it. **6.** Retention periods are set in the schedule, not in this policy, because they depend on the type of record and on the rules that apply to James Patel. The schedule lists each record type, its retention period, the event that starts it, what happens at the end, and where it is held. It is kept by Office Manager and reviewed at least How often the schedule is reviewed, for example, once a year; update it before any new record type is used or a system changes. If the schedule and this policy disagree, follow the schedule and tell Office Manager so the policy can be corrected.

3. Legal hold

A legal hold is an instruction to stop the normal disposal of records relating to a matter, because they may be needed for a dispute, investigation, audit, or legal process. **1.** A hold may be placed by Office Manager, in writing, naming the matter, the records covered, and the person who placed it. **2.** When a hold is placed, the people named in it must stop disposing of any record it covers, even one that would otherwise reach the end of its retention period. **3.** A hold overrides the schedule until it is lifted in writing by Office Manager. **4.** Records under a hold must be kept secure and not altered, moved, or shared except as the hold instruction allows. **5.** If you are unsure whether a record is covered by a hold, treat it as covered and ask Office Manager before disposing of it.

4. Disposal, breach, review and related documents

Dispose of records in a way that fits how sensitive they are: shred paper records containing personal or confidential information, or place them in a locked confidential waste bin; delete electronic records from live systems and, where applicable, from backups on their normal cycle, and make the deletion verifiable. Disposal must be authorised by Office Manager and logged, with the type of record, the date range, the method, and who authorised it. Records that are not personal or confidential may be disposed of by Disposal method for non-confidential records, for example, recycling or routine deletion. Do not sell, give away, or throw away equipment that may hold records until Office Manager has checked and cleared it. A breach includes destroying a record before the end of its retention period or under a legal hold, disposing of a record without authorisation, or keeping a record where people who should not see it can access it. Report any breach, or suspected breach, to Office Manager as soon as possible and no later than Number of working days working day(s) after you become aware of it. Office Manager will record the breach, assess the records affected, and decide what action is needed, including whether any record can be recovered. Where a breach may affect the applicable requirement, tell Office Manager promptly; they must decide whether outside advice is needed. Breaches are handled under the disciplinary process of James Patel where the breach was deliberate or repeated. This policy is reviewed at least How often this policy is reviewed, for example, once a year, and whenever the applicable requirement changes, a new record type is created, or a system changes. The review is carried out by Office Manager and approved by Office Manager. Version history: Version number 9 November 2026 Description of the change, by James Patel. Related: Document Retention Schedule; James Patel; James Patel.

Approved: Office Manager, Helen Morris, 9 November 2026 | Office Manager, Helen Morris, 9 November 2026